

AYABE, CHONG, NISHIMOTO,
SIA & NAKAMURA, A Limited
Liability Law Partnership

JEFFREY H. K. SIA 3029-0
DIANE W. WONG 2333-0
DAVID A. GRUEBNER 5799-0
1003 Bishop Street, Suite 2500
Honolulu, Hawaii 96813
Telephone No.: (808) 537-6119
jeffrey.sia@hawadvocate.com
diane.wong@hawadvocate.com
david.gruebner@hawadvocate.com

Attorneys for Defendants
MERSCORP, INC., MORTGAGE
ELECTRONIC REGISTRATION
SYSTEMS, INC., CHASE HOME
FINANCE LLC, and CHASE HOME
FINANCE, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

MELVIN KEAKAKU AMINA and)	CIVIL NO. CV 10-00165 JMS/KSC
DONNA MAE AMINA, Husband and)	
wife,)	DEFENDANTS MERSCORP, INC.,
)	MORTGAGE ELECTRONIC
)	REGISTRATION SYSTEMS, INC.,
Plaintiffs,)	CHASE HOME FINANCE LLC,
)	AND CHASE HOME FINANCE,
)	INC.'S MOTION TO COMPEL
vs.)	PRODUCTION OF DOCUMENTS;
)	[continued on next page]
)	
)	Date:
WMC MORTGAGE, LLC, Successor)	Time:
in Interest to WMC Mortgage Corp.;)	Judge: Kevin S.C. Chang
GENERAL ELECTRIC COMPANY;)	Trial date: 2/28/12

MERSCORP, INC.; MORTGAGE)	
ELECTRONIC REGISTRATION)	MEMORANDUM IN SUPPORT OF
SYSTEMS, INC.; CHASE HOME)	MOTION; DECLARATION OF
FINANCE LLC; CHASE HOME)	DAVID A. GRUEBNER; EXHIBITS
FINANCE, INC.; and UNKNOWN)	“A” – “C”; CERTIFICATE OF
OWNERS OF THE EVIDENCE OF)	SERVICE
DEBT and/or OWNERS OF THE)	
NOTE,)	

Defendants.

[2010141JHKS/#522943]

DEFENDANTS MERSCORP, INC., MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., CHASE HOME FINANCE LLC,
AND CHASE HOME FINANCE, INC.’S
MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Defendants MERSCORP, INC., MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., CHASE HOME FINANCE LLC, and
CHASE HOME FINANCE, INC. (hereinafter collectively referred to as
“Defendants”) hereby move this Court for an order compelling Plaintiffs to
produce documents in response to Defendants’ First Request For Production of
Documents to Plaintiffs.

This motion is based on Rule 37(a) of the Federal Rules of Civil
Procedure, the declaration of counsel, exhibits attached, and the records and files in
this case.

DATED: Honolulu, Hawaii, November 30, 2011.

/s/ David A. Gruebner

JEFFREY H. K. SIA

DIANE W. WONG

DAVID A. GRUEBNER

Attorneys for Defendants

MERSCORP, INC., MORTGAGE

ELECTRONIC REGISTRATION

SYSTEMS, INC., CHASE HOME

FINANCE, LLC, and CHASE HOME

FINANCE, INC.